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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**

13 State of Arizona, *ex rel.* Kristin K. Mayes,
14 Attorney General; State of Alabama *ex rel.*
15 Attorney General Steve Marshall; State of
16 Arkansas, *ex rel.* Tim Griffin; People of the
17 State of California *ex rel.* Rob Bonta, Attorney
18 General of California; State of Colorado; State
19 of Connecticut; State of Delaware *ex rel.*
20 Kathleen Jennings, Attorney General of the
21 State of Delaware; District of Columbia; Office
22 of the Attorney General, State of Florida,
23 Department of Legal Affairs; State of Georgia,
24 *ex rel.* Christopher M. Carr, Attorney General
25 of the State of Georgia; State of Hawaii; State
26 of Idaho, through Attorney General Raúl R.
27 Labrador; People of the State of Illinois; State
28 of Indiana; State of Iowa *ex rel.* Brenna Bird,
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Commonwealth of Kentucky; State of
Louisiana; State of Maine; Maryland Office of
the Attorney General; Commonwealth of
Massachusetts; People of the State of
Michigan; State of Minnesota, by its Attorney
General, Keith Ellison; State of Mississippi *ex*
rel. Attorney General Lynn Fitch; State of

NO. CV-23-00233-TUC-CKJ

**APPLICATION FOR CLERK'S
ENTRY OF DEFAULT**

1 Missouri, ex. rel. Andrew Bailey, Attorney
2 General; State of Montana; State of Nebraska,
3 *ex rel.* Michael T. Hilgers, Attorney General;
4 State of Nevada; State of New Hampshire;
5 State of New Jersey; State of New Mexico, *ex*
6 *rel.* Raúl Torrez, Attorney General; People of
7 the State of New York, by Letitia James,
8 Attorney General of the State of New York;
9 State of North Carolina, *ex rel.* Attorney
10 General Joshua H. Stein; State of North Dakota,
11 *ex rel.* Drew H. Wrigley, Attorney General;
12 State of Ohio *ex rel.* Attorney General Dave
13 Yost; State of Oklahoma *ex rel.* Attorney
14 General Gentner Drummond; State of Oregon,
15 *ex rel.* Ellen F. Rosenblum, Attorney General
16 for the State of Oregon; Commonwealth of
17 Pennsylvania, by Attorney General Michelle A.
18 Henry; State of Rhode Island; State of South
19 Carolina ex. rel. Attorney General Alan
20 Wilson; State of Tennessee; State of Texas;
21 Utah Division of Consumer Protection; State of
22 Vermont; Commonwealth of Virginia, *ex rel.*
23 Jason S. Miyares, Attorney General; State of
24 Washington; State of West Virginia *ex rel.*
25 Patrick Morrissey, Attorney General; State of
26 Wisconsin; and State of Wyoming,

18 Plaintiffs;

19 v.

20
21 Michael D. Lansky, L.L.C., dba Avid Telecom;
22 an Arizona limited liability company;

23 Michael D. Lansky, individually as a Member/
24 Manager/Chief Executive Officer of Michael
25 D. Lansky, L.L.C., dba Avid Telecom; and

26 Stacey S. Reeves, individually as a
27 Manager/Vice President of Michael D. Lansky,
28 L.L.C., dba Avid Telecom,

Defendants.

1 Plaintiffs respectfully request the Clerk of Court's Entry of Default against
2 Defendants Michael D. Lansky, L.L.C, dba Avid Telecom ("Avid Telecom"), Michael D.
3 Lansky ("Lansky"), and Stacey S. Reeves ("Reeves") (collectively, "Defendants"),
4 pursuant to Federal Rule of Civil Procedure 55(a), for failure to answer or otherwise
5 timely defend this action after Defendants waived service. In support of this request,
6 Plaintiffs show:

7 1. On May 23, 2023, Plaintiffs filed their complaint against Defendants.
8 ECF No. 1.

9 2. On May 23, 2023, Plaintiffs mailed waivers of service to Defendants.

10 3. On June 13, 2023, Plaintiffs, through the State of Arizona, filed a Waiver
11 of Service for Defendant Reeves. ECF No. 11.

12 4. On June 20, 2023, Plaintiffs, through the State of Arizona, filed a Waiver
13 of Service for Defendants Lansky and Avid Telecom. ECF No. 12.

14 5. On June 20, 2023, Lee Stein filed a Notice of Appearance on behalf of
15 Defendant Reeves. ECF No. 13.

16 6. The original answer date for all Defendants was July 24, 2023.

17 7. On July 10, 2023, Defendant Reeves, through Mr. Stein, filed the First
18 Motion for Extension of Time to File Answer ("First MTE"). ECF No. 14.

19 8. The First MTE was said to be filed on behalf of all Defendants.

20 9. At the top of the First MTE, Neil S. Ende, Esq., managing partner of the
21 Technology Law Group, LLC in Washington, DC, was identified as representing
22 Defendants Lansky and Avid Telecom. Further, the First MTE expressly stated "Pro
23 Hac Vice motion to be filed." ECF No. 14.

24 10. The First MTE was unopposed by Plaintiffs.

25 11. On July 20, 2023, Mr. Stein filed a Motion to Withdraw as Attorney for
26 Defendant Reeves. ECF No. 15.

27 12. On July 24, 2023, the Court granted the First Motion for Extension of
28 Time to File Answer, setting a response date of September 7, 2023. ECF No. 16.

1 13. On July 24, 2023, the Court granted Mr. Stein’s Motion to Withdraw as
2 Attorney. ECF No. 17.

3 14. Before and since July 24, 2023, Plaintiffs, through counsel for the lead
4 states of Arizona, Indiana, North Carolina, and Ohio, have spoken with Mr. Ende and
5 Matt Albaugh about the Plaintiffs’ complaint and case.

6 15. Mr. Ende has stated in conversations with Plaintiffs’ counsel for the states
7 of Arizona, Indiana, North Carolina, and Ohio that he represents all Defendants in this
8 action.

9 16. Mr. Albaugh, who is a partner at Taft Stettinius & Hollister LLP in
10 Indianapolis, Indiana, has stated in conversations with Plaintiffs’ counsel for the states
11 of Arizona, Indiana, North Carolina, and Ohio that he represents only Defendant Avid
12 Telecom.

13 17. At the time of this filing, the docket reflects that Defendants do not have
14 any attorney who has filed a notice of appearance on their behalf in this matter or an
15 attorney who did not subsequently withdraw.

16 18. The docket reflects that Defendant Reeves is pro se.

17 19. A *pro hac vice* application was granted for Mr. Ende by this Court on
18 April 6, 2023, but only as to Mr. Ende’s appearance in case No. CV-22-00558-TUC-
19 JCH, which is a different proceeding in the United States District Court for the District
20 of Arizona that involves Defendants Avid Telecom and Lansky.

21 20. “It has been the law for the better part of two centuries ... that a
22 corporation may appear in the federal courts only through licensed counsel.” *Rowland*
23 *v. California Men's Colony, Unit II Men's Advisory Council*, 506 U.S. 194, 201-02,
24 113 S.Ct. 716, 121 L.Ed.2d 656 (1993); *see also, e.g., In re Highley*, 459 F.2d 554,
25 555 (9th Cir. 1972) (“A corporation can appear in a court proceeding only through an
26 attorney at law.”); *Russell v. United States*, 308 F.2d 78, 79 (9th Cir. 1962). “[T]he
27 purpose of the rule requiring corporations to appear by an attorney is to ensure that the
28 court has greater control over the management and administration of the case.”

1 21. All Defendants have waived service, and these waivers have been filed
2 with the Court. ECF Nos. 11 and 12.

3 22. Defendants requested and were granted an extension to file a response
4 and answer by September 7, 2023. ECF No. 16.

5 23. On September 7, 2023, at 6:42 PM Eastern (3:42 PM Pacific), Mr.
6 Albaugh emailed lead counsel for Arizona, Indiana, North Carolina, and Ohio to
7 request an extension of thirty (30) days. Mr. Ende was copied on the email.

8 24. On September 7, 2023, at 8:19 PM Eastern (5:19 PM Pacific), lead
9 counsel for Arizona, Indiana, North Carolina, and Ohio emailed Mr. Albaugh and Mr.
10 Ende, declining the last-minute request for an extension because a further delay is
11 unwarranted, as Plaintiffs do not believe Defendants have demonstrated they are
12 interested in resolving this matter by agreement within the next thirty days.

13 25. Defendants did not file an answer or response on or before September 7,
14 2023.

15 26. Defendants have “failed to plead or otherwise defend” this suit, and this
16 has been shown through motion. Fed R. Civ. P. 55(a).

17 For the foregoing reasons, Plaintiffs respectfully request the Clerk of Court enter
18 a default against Defendants Michael D. Lansky, L.L.C, dba Avid Telecom, Michael D.
19 Lansky, and Stacey S. Reeves pursuant to Rule 55(a) of the Federal Rules of Civil
20 Procedure.

21
22 RESPECTFULLY SUBMITTED DATED this 8th day of September, 2023.
23
24
25
26
27
28

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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2023, I caused the foregoing to be filed and served electronically via the Court's CM/ECF system upon counsel of record. For parties whose counsel have not yet entered an appearance, copies of this motion have been served via certified mail and electronic mail to:

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